REMARKS

Applicant expresses appreciation to the Examiner for consideration of the subject patent application. This amendment is in response to the Office Action mailed August 4, 2006. Claims 1-13 are pending, claims 14-44 are canceled pursuant to a restriction requirement. Claims 1-13 stand rejected. Claim 1 has been amended to more clearly and distinctly claim the present invention.

Claim Rejections - 35 U.S.C. § 102

Claims 1-3, 12 and 13 were rejected under 35 U.S.C. § 102(e) as being anticipated by U.S. Patent Application Publication No. 2005/0078104 to Matthies (hereinafter "*Matthies*").

Claim 1 has been amended to more clearly claim and distinguish the present invention. In particular, claim 1 has been amended to clarify that the pixel layer provides a repeating pattern of sub-displays *formed on a continuous pixel layer sheet*. For example, the repeating pattern of sub-displays may be formed on a roll of pixel layer material using roll to roll processing (page 7, lines 1-12). The pixel layer may be, for example, a sheet of organic semiconductor (page 6, lines 22-24).

Claim 1 has also been amended to clarify that the connection layer is *a continuous sheet* with conductive traces for distribution of power and data to the drivers. For example, the connection layer can provide power and communicate data to the entire large area display using conductive traces on one or more layers (page 3, lines 4-10). The connection layer can also be formed using roll to roll processing (page 7, lines 7-9). The pixel layer, the connection layer, and the drivers are laminated together to form the large area display (page 7, lines 15-20).

In contrast, the large area display of *Matthies* is formed by coupling together a number of individual sub-display tiles (para 2). The basic unit of manufacture is the individual sub-display tile (para 12). Individual (sub)-display sections are assembled with electronics sections to form sub-display tiles (para 76). The completed sub-display tiles are then assembled into a display by mounting on a backpanel or frame and soldering or plugging the sub-display tiles into connectors (para 88, 142-144). *Matthies* thus fails to teach a large area display formed from continuous sheets having plural sub-displays and interconnection conductive traces as in the present invention.

These differences between *Matthies* and the present invention are further exemplified by the teachings of *Matthies* that using individual tiles to form a large display presents a challenge in eliminating visibility of seams between tiles and providing electrical access to the pixels (para 13). *Matthies* solves this problem by placing pixels close to the edge of the individual tiles (para 72), placing a black matrix in front of the tiles to cover the gaps (para 147-148), or placing mullions in front of the tiles to cover the gaps (para 149-150). The present invention avoids the problem of gaps between sub-displays, since the sub-displays are formed on a continuous sheet.

Accordingly, *Matthies* fails to teach or suggest a large area display comprising "a pixel layer having a repeating pattern of sub-displays formed on a continuous sheet" and "a connection layer … having a continuous sheet with conductive traces for distributing power and data to the drivers" as claimed. Therefore, Applicant respectfully submits that claim 1 is allowable over *Matthies* for at least this reason and requests the Examiner to withdraw the rejection.

Claims 2, 3, 12 and 13, being dependent from claim 1, are similarly allowable. With respect to claim 13, Applicant further notes that *Matthies* teaches providing a connector on each tile to allow interconnection of the tiles into a large area display. This is because no continuous connection layer is disclosed in *Matthies*, and external communication is provided by a cable harness (para 122). In contrast, claim 13 recites a connector *in communication with the connection layer* for external communication. Because the connection layer is a continuous sheet providing power and data routing to the entire large area display, the connector can provide external communication for the large area display. As *Matthies* fails to teach or suggest using a connector coupled to a continuous connection layer sheet for external communication for a large area display, claim 13 is also allowable for at least this reason.

Claim Rejections - 35 U.S.C. § 103

Claims 4-8 and 10 were rejected under 35 U.S.C. § 103 as being unpatentable over *Matthies* in view of U.S. Patent No. 5,396,304 to Salerno et al. ("*Salerno*"). As these claims are all dependent from claim 1, they are allowable for at least the above reasons.

Claim 9 was rejected under 35 U.S.C. § 103 as being unpatentable over *Matthies* in view of U.S. Patent No. 6,147,724 to Yoshii et al. ("*Yoshii*"). As claim 9 is dependent from claim 1, it is allowable for at least the above reasons.

Claim 11 was rejected under 35 U.S.C. § 103 as being unpatentable over *Matthies* in view of U.S. Patent Application Publication No. 2005/0007337 to Albert et al. ("*Albert*"). As claim 11 is dependent from claim 1, it is allowable for at least the above reasons.

CONCLUSION

In light of the above, Applicant respectfully submits that pending claims 1-13 are now in condition for allowance. Therefore, Applicant requests that the rejections and objections be withdrawn, and that the claims be allowed and passed to issue. If any impediment to the allowance of these claims remains after entry of this Amendment, the Examiner is requested to call Steve M. Perry at (801) 566-6633 so that such matters may be resolved as expeditiously as possible.

The Commissioner is hereby authorized to charge any additional fee or to credit any overpayment in connection with this Amendment to Deposit Account No. 08-2025.

DATED this 1st day of November, 2006.

Respectfully submitted,

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